

EXHIBIT 22

Bryson, Santana and Joshua v. Rough Country, LLC

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF GEORGIA
3 GAINSVILLE DIVISION

4 SANTANA BRYSON AND JOSHUA
5 BRYSON, as Administrators
6 of the Estate of C.Z.B.,
7 and as surviving parents of
8 C.Z.B., a deceased minor,

Plaintiffs,

CASE NO.

vs.

2:22-CV-017-RWS

9 ROUGH COUNTRY, LLC,
10 Defendant.

11
12
13 VIDEOTAPE DEPOSITION OF G. BRYANT BUCHNER, P.E.
14 APPEARING REMOTE FROM
15 TALLAHASSEE, FLORIDA

JANUARY 23, 2024

11:13 A.M.

16
17
18
19
20
21 Reported Remotely By:
22 Judith L. Leitz Moran
23 RPR, RSA, CCR-B-2312
24
25

1 Q Right.

2 A You -- you could calculate it from this
3 if you -- potentially but, you know, it -- you
4 don't need it.

5 Q All right. And you -- you basically
6 accounted for a zero pre-impact speed for the
7 Escape --

8 A Yes.

9 Q -- in the calculations?

10 A Yes.

11 Q And then your post-impact speed for the
12 Escape was what?

13 A 40.6 miles an hour in my calculation.

14 Q Okay. And so the delta-V for the Escape
15 will be approximately the same; is that right, or
16 no?

17 A What was the question?

18 Q Yeah. So what was the delta-V of the
19 Escape?

20 A 40.6.

21 And I misspoke a minute ago. If we input
22 the 0 miles per hour -- well, anyway, we did it --
23 we did set up a series of equations that used the
24 -- that saw for the restitution. I said we didn't
25 do that, but we did actually -- we did use the

1 bit, we want to take the tires out of that, the
2 .35 inches, which is in the fourth box down, is
3 only .03 feet.

4 So if we do .55 minus .03 we get .52.
5 And that's .52 feet, multiply that by 12, we get 6
6 1/4 inches.

7 So effectively the total lift was closer
8 to 6 1/2 and the body lift was a little over 6.
9 Just to clarify.

10 And so 6.1 that I put in the report was
11 the body lift. It was intended to be the body
12 lift. So the body lift really is a little over 6
13 inches. When you add the tires in you're closer to
14 the 6 1/2 inches.

15 So I -- I was mistaken when I said 5 1/2
16 earlier. I missed my decimal points. And I -- I
17 thought the .35 or the .7 that's right there was in
18 feet. It's not. It's -- I thought it was at
19 .07 feet, it's not, it's .07 inches, and so I made
20 a mistake. So body lift is more than 6 inches.

21 Q The third box that has the bracket
22 height, how did you come up with those numbers,
23 those values?

24 A Well, I laid on the ground under both
25 vehicles and measured the height off the ground.